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Attorneys for Claimant Kimberly Locke-Russell

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In Re  
PG&E CORPORATION,  
and  
PACIFIC GAS AND ELECTRIC  
COMPANY  
Debtors.

Affects:

PG&E Corporation  
Pacific Gas & Electric Company  
**Both Debtors**

\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).

Case No. 19-30088 (DM)

Chapter 11

(Lead Case—Jointly Administered)

**KIMBERLY LOCKE-RUSSELL'S  
NOTICE OF HEARING ON  
MOTION TO ALLOW/DEEM  
TIMELY LATE FILING OF PROOF  
OF CLAIM BY KIMBERLY  
LOCKE-RUSSELL**

Date: March 24, 2021

Time: 10:00 a.m. (Pacific)

Place: **Telephonic Appearances Only**  
United States Bankruptcy

Court: Courtroom 17, 16th Floor  
San Francisco, CA 94102

**PLEASE TAKE NOTICE** that on March 24, 2021 or as soon as this matter may be heard, attorney Angela Jae Chun, Esq., of counsel to Casey Gerry Schenk Francavilla Blatt & Penfield LLP (Casey Gerry) moves on behalf her client Kimberly Locke-Russell ("Ms. Locke-Russell") to deem her-late-filed proof of claim timely.

**PLEASE TAKE NOTICE** that the telephonic hearing on the Motion will take place on March 24, 2021 (Pacific Time) in the Courtroom of the Honorable Dennis

1 Montali, United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden Gate  
2 Avenue, San Francisco, CA 91402.

3 **PLEASE TAKE NOTICE that** Locke-Russell's Motion is based on the fact  
4 Ms. Locke-Russell truly believe she was listed as a claimant on her parents' POC,  
5 only later to find out she was not after the time period to file POCs had expired. Her  
6 Motion is based on this notice, the accompanying memorandum of points and  
7 authorities and any exhibits thereto, along with the declaration of Ms. Chun.

8 **PLEASE TAKE NOTICE** that all interested parties should consult the  
9 Bankruptcy Court's website at [www.canb.uscourts.gov](http://www.canb.uscourts.gov) for information about court  
10 operations during the COVID-19 pandemic. The Bankruptcy Court's website provides  
11 information regarding how to arrange a telephonic or video appearance. If you have  
12 questions regarding how to appear at a court hearing, you may contact the Bankruptcy  
13 Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy  
14 Court's website.

15 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to  
16 the Motion must be in writing, filed with the Bankruptcy Court, and served to Ms.  
17 Chun by the time set by the Bankruptcy Court. Any oppositions or responses must be  
18 filed and served on all "Standard Parties" as defined in, and under, the Second  
19 Amended Order Implementing Certain Notice and Case Management Procedures  
20 entered on May 14, 2019 (EFC No. 1996) ("Case Management Order"). Any relief  
21 requested in the Motion may be granted without a hearing if no opposition is timely  
22 filed and served under the Case Management Order. In deciding the Motion, the Court  
23 may consider any other document filed in these Chapter 11 Cases and related  
24 adversary proceedings.

25 **PLEASE TAKE FURTHER NOTICE** that that copies of the Motion and its  
26 supporting papers can be viewed and/or obtained: (i) by accessing the Court's website  
27 at <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the  
28 Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the

1 Debtors' notice and claims agent, Prime Clerk LLC , at  
2 <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for  
3 U.S.-based parties; or +1 (929) 333-8977 for International parties

4 Note that a PACER password is needed to access documents on the Bankruptcy  
5 Court's website.

6  
7 Dated: February\_23, 2021 CASEY GERRY SCHENK  
8 FRANCAVILLA BLATT & PENFIELD, LLP

9 By: s/Angela Jae Chun  
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12 Attorneys for Claimant  
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